BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997:

DOCKET NO. R97-1

INTERROGATORY
OF
PARCEL SHIPPERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE
WITNESS PAUL G. SECKAR (USPS-T-26)

The Parcel Shippers Association (PSA) requests United States Postal Service to respond, fully and completely to the following interrogatory and request for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,

Timothy J. May, Esquire PATTON BOGGS, L.L.P.

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Counsel for Parcel Shippers Association

Dated: August 18, 1997

INTERROGATORY OF PARCEL SHIPPERS ASSOCIATION TO UNITED STATES POSTAL SERVICE WITNESS SECKAR

PSA/USPS-T26-1. In your testimony you develop volume variable mail processing costs for each rate category of flats, among others, within Standard Mail (A). Please provide for the record the following:

- (a) The estimated volume and attributable costs TYAR, and the corresponding estimated revenues per piece TYAR for Regular Standard Mail (A) flats, and confirm whether you are able to segregate the non-flat, so-called residual pieces from the cost, volumes, and revenues.
- (b) Please provide the volume, revenues, and estimated attributable costs

 TYAR for Regular (A) non-flat residual pieces, and for Regular ECR non-flat residual pieces.

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

Timothy J. May

Dated: August 18, 1997

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